IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA MACON DIVISION

JUDITH FIELDER and WILLIAM FIELDER,

Plaintiffs,

Civil Action No. 5:21-CV-00432

v.

LATIUM USA TRADING LLC, d/b/a Superior Mason Products, MICHAEL TURNER, and UNITED STATES FIRE INSURANCE COMPANY,

Defendants.

CONSENT PROTECTIVE ORDER REGARDING FINANCIAL MATERIALS

Plaintiffs and Defendants, by and through their respective undersigned counsel of record, (hereinafter collectively referred to as "the Parties"), hereby agree that any and all tax, revenue, or other financial documents and information regarding Latium USA Trading LLC ("Latium") produced on or after this date in connection with the above-captioned litigation shall be used only for the purposes of this litigation, shall be destroyed or returned to counsel for Latium upon resolution of this case, and will be kept strictly confidential.

The Parties further agree that any and all documents and information covered by this Stipulation will not be disseminated in any fashion outside the offices of counsel representing the Parties except to potential experts, who will be notified of and bound by this Protective Order. Said experts are required to execute the Acknowledgement and Declaration of Compliance, attached hereto as Exhibit A, prior to the disclosure of any of the documents that are covered by this Stipulation. Counsel for the Parties agree to confirm that any expert witnesses will destroy documents covered by this Protective Order at the conclusion of the case.

Furthermore, in the event the Parties should have reason to file any of the documents or information covered by this Protective Order with the Court, the Defendants reserve the right to seek additional protections such an order sealing confidential financial information covered by this Order at the conclusion of this case and Plaintiffs agree that they will not object to a such motions.

SO ORDERED, this A day of

UNITED STATES DISTRICT COURT

Submitted by:

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Georgia Bar No. 753030

Counsel for Defendants

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Attorneys for Plaintiff